

## Introduction

### Welcome to Acorn Insurance and Financial Services Limited's privacy notice.

Acorn Insurance and Financial Services Limited t/a Acorn Insurance respects your privacy and is committed to protecting your personal data. This privacy notice tells you how we look after your personal data when you visit our website [www.acorninsure.co.uk](http://www.acorninsure.co.uk) (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

#### 1 Important information and who we are

##### Purpose of this privacy notice

This privacy notice aims to give you information about how Acorn Insurance collects and processes your personal data through your use of this website, including any data you may provide through this website when we communicate with each other. The types of personal data we collect are listed in section 2 below.

This website is not intended for children and we do not knowingly collect data relating to children.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

##### Controller

Acorn Insurance and Financial Services Limited t/a Acorn Insurance is the controller and responsible for your personal data (collectively referred to as "we", "us" or "our" in this privacy notice).

We have appointed a data protection officer (DPO) who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise any of the legal rights detailed in section 9 below, please contact the DPO using the details set out below.

##### Contact details

Our full details are: Acorn Insurance and Financial Services Limited t/a Acorn Insurance, registered in England and Wales with company registration number 01636368.

Name or title of DPO: Data Protection Officer

Email address: [dataprotection@acorninsure.co.uk](mailto:dataprotection@acorninsure.co.uk)

Postal address: 98 Liverpool Road, Formby, Liverpool L37 6BS

You have the right to make a complaint about how we handle your personal data at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

## **Third-party links**

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

## **2 The data we collect about you**

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- (a) Identity Data includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth.
- (b) Contact Data includes billing address, delivery address, email address and telephone numbers.
- (c) Financial Data includes bank account and payment card details.
- (d) Transaction Data includes details about payments to and from you and other details of products and services you have purchased from us.
- (e) Technical Data includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- (f) Profile Data includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- (g) Usage Data includes information about how you use our website, products and services.
- (h) Marketing and Communications Data includes your preferences in receiving marketing from us and our third parties and your communication preferences.
- (i) Policy Data includes information on quotes, your current policy as well as lapsed and cancelled policies you might have had with us.
- (j) Claims Data includes information about none fault and fault claims you have made with us and other insurers.
- (k) Telematics Data includes information collected on your location, speed and other driving characteristics as part of any policy that you purchase from us that requires you to have a telematics tracking device installed.

We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly

or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

We do not intentionally collect the following Special Categories of Personal Data about you: details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership and information about genetic and biometric data. However, we may be able to infer from information that you provide to us (such as photographic evidence, relationship details and geolocation), certain special types of personal data.

We do collect details about your vehicle, health and criminal convictions for the purposes of calculating the risk of providing you with insurance (and insuring the vehicle and/or your property).

### **If you fail to provide personal data**

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

## **3 How is your personal data collected?**

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
  - apply for our products;
  - create an account on our website;
  - request marketing to be sent to you; or
  - give us some feedback or submit messages to us.
- **Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies.
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources as set out below:
  - a) Insurance Brokers/Financial advisers
  - b) Card associations
  - c) Credit reference agencies
  - d) Insurers
  - e) Comparison websites
  - f) Social networks
  - g) Fraud prevention agencies

- h) Payroll service providers
  - i) Land agents
  - j) Public information sources such as Companies House
  - k) Agents working on our behalf
  - l) Government and law enforcement agencies.
- **Technical Data** from use of the telematics tracking device (as further described below). The device is installed in your car by Avian Fleet. They also maintain the device and monitor it for faults. If you have any questions regarding the data collected by Avian Fleet, as part of the services they provide to you and us, you can contact them via their website ([www.avianfleet.com](http://www.avianfleet.com)). Data from the tracking device is collected by Concirrus via a mobile data link. If you have any queries regarding the data collected by Concirrus, you can contact them through their website ([www.concirrus.com](http://www.concirrus.com)).

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

Generally we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

**Purposes for which we will use your personal data**

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer and/or to process your insurance quote	(a) Identity (b) Contact	Performance of a contract with you
To process and deliver your order including: (a) Manage payments,	(a) Identity (b) Contact	(a) Performance of a contract with you (b) Necessary for our legitimate

<p>fees and charges</p> <p>(b) Collect and recover money owed to us</p> <p>(c) Credit checks and fraud prevention</p>	<p>(c) Financial</p> <p>(d) Transaction</p> <p>(e) Marketing and Communications</p>	<p>interests (to recover debts due to us)</p>
<p>To manage and administer our relationship with you which will include:</p> <p>(a) Notifying you about changes to our terms or privacy policy</p> <p>(b) Asking you to leave a review or take a survey</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Marketing and Communications</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary to comply with a legal obligation</p> <p>(c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products)</p>
<p>To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Technical</p>	<p>(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)</p> <p>(b) Necessary to comply with a legal obligation</p>
<p>To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Usage</p> <p>(e) Marketing and Communications</p> <p>(f) Technical</p>	<p>Necessary for our legitimate interests (to study how customers use our products, to develop them, to grow our business and to inform our marketing strategy)</p>
<p>To use data analytics to improve our website, products/services, marketing, customer relationships and experiences</p>	<p>(a) Technical</p> <p>(b) Usage</p>	<p>Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)</p>
<p>To market to you and make suggestions and recommendations to you about goods or services that may be of interest to you</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Technical</p> <p>(d) Usage</p> <p>(e) Profile</p>	<p>Necessary for our legitimate interests (to develop our products and grow our business)</p>
<p>To contact you via email sms and phone regarding outstanding documentation</p>	<p>(a) Identity</p> <p>(b) Contact</p>	<p>(a) Necessary for our legitimate interests (for running our business, provision of administration and IT</p>

and to inform you of our office opening times over holiday periods etc. and about your renewals as required by the FCA	(e) Marketing and Communications	services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)  (b) Necessary to comply with a legal obligation
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### **Telematics tracking device**

Where you purchase a policy from us that requires you to install a telematics tracking device in your vehicle, we will (at the time of usage) collect information regarding the speed of your car, acceleration, braking, cornering and mileage.

The above information will be used to build a profile of how, where and when your vehicle is driven. We will use this information to identify extreme driving events which could result in an additional fee being charged to you or, the cancellation of your policy.

We will also monitor the data collected from the telematics tracking device to assess when and how far you drive your vehicle between the hours of 23.00 and 05.00 and, to calculate your total mileage. Where either of these amounts exceed the amounts stated on the schedule of your total driving time/mileage (as set out in your policy), we reserve the right to cancel your policy.

The GPS location data obtained from the telematics tracking device assists us in assessing the types of roads you use and may also help the police recover your car if it is stolen. However, we will not release your data to the police or to any civil authority, unless we have your consent to do so, or we suspect fraud (or attempted fraud) or, if we are required to do so by law.

Where we cancel your policy due to extreme driving, this information will be shared with other insurers and may lead third party insurance providers to refuse your application for motor insurance

Please refer to the “Sharing Your Personal information” section of your policy for further information on how we will use the data obtained through the telematics tracking device.

### **How we use your information to make automated decisions**

We sometimes use systems to make automated decisions based on personal data we have – or can collect from others – about you or your business. This helps us to make sure our decisions are quick, fair, efficient, and correct, based on what we know. These automated decisions can affect the products, services or features we may offer you now or in the future, or the price that we charge you for them.

Here are the types of automated decision we make:

#### **Pricing**

We may decide what to charge for some products and services based on what we know.

#### **Detecting fraud**

We use your personal data to help decide if your insurance policy may be being used for fraud or money-laundering. We may detect that a policy is being used in

ways that fraudsters work. Or we may notice that a policy is being used in a way that is unusual for you. If we think there is a risk of fraud, we may stop activity on your policy or cancel them.

### **Obtaining a quote**

When you ask for a quote from us, we use your information to check the market to get the best price and product for you. This may include checking age, residency, nationality, or financial position.

### **Approving credit**

If you apply for credit with us, we will use a system to decide whether to lend money to you - this is called credit scoring. The system uses past data to assess how you are likely to act when paying back any money you borrow. This includes data about similar accounts you may have had before.

Credit scoring uses data from three sources:

- Your application form
- Credit reference agencies
- Data we may already hold.

It gives an overall assessment based on the above. Banks and other lenders use this to help us make responsible lending decisions that are fair and informed. Credit scoring methods are tested regularly to make sure they are fair and unbiased.

When automated decisions are made about you, you have the right to:

- ask that we do not make our decision based on the automated score alone; and
- object to an automated decision and ask for it to be reviewed.

If you want to know more about these rights, please contact us.

### **Marketing**

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased a policy from us and, in each case, you have opted into receiving that marketing.

We will get your express opt-in consent before we share your personal data with any company outside our group of companies for marketing purposes.

### **Opting out**

You can ask us to stop sending you marketing messages at any time by contacting our customer services team on [admin@acorninsure.com](mailto:admin@acorninsure.com).

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product purchase, warranty registration, product experience or other transactions.

## **Cookies**

### **(a) What they comprise**

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our website. For detailed information on the cookies we use and the purposes for which we use them please see paragraph (b) below.

### **(b) What we use them for**

We may use cookies in two ways:

- (i) per-session cookies are used while you are logged on to our website to record temporary data relating to your visit to our Website, to manage the delivery of web pages to; you and any registration and ordering processes, and to help us monitor traffic through the Website; and
- (ii) logon and usage cookies store some data between visits to our Website in order to allow you to log on to your account more easily, and using them we are able to personalise your experience and create a database of your previous choices and preferences, and in situations where those choices or preferences need to be collected again, they can be supplied by us automatically, saving you time and effort. For example, after you purchase a product once, if you need to purchase it again your previous selection of options will be retained and can be re-entered more quickly.

### **(c) Deactivating Cookies**

If you do not want to use “cookies” most internet browser programs will permit you to turn them off. Should you do this you will still be able to access most of our website as normal but some processes that depend on cookies may not work properly. Your computer may be specially configured to reject cookies: please refer to your browser for more information.

## **Change of purpose**

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## **Purposes of disclosure and recipients**

We do not share personal data with any third parties except as provided below or as required by law:

### **(a) Motor Insurers Bureau (MIB)**

Where you take out an insurance policy with us, we will add information about this policy to the Motor Insurance Database (**MID**). The MID is managed by the MIB and data which is stored on it may be used by certain statutory and/or authorised bodies (including the police, DVLA, DVLNI and the Insurance Fraud Bureau).

This information may be used for various purposes permitted by law, which include but are not limited to:

- Electronic Licensing
- Continuous insurance enforcement
- Law enforcement (prevention, detection, apprehension and/or prosecution of offenders)
- The provision of government services and/or other services aimed at reducing the level and incidence of uninsured driving.

If you are involved in a road traffic accident (either in the UK, the European Economic Area or certain other territories), insurers and/or the MIB may search the MID to obtain relevant information.

Persons (including his or her appointed representative) pursuing a claim in respect of a road traffic accident (including citizens of other countries) may also obtain relevant information which is held on the MID.

Information which is supplied to fraud prevention agencies and databases such as a MID can include details such as your name, address and date of birth together with details of any injury arising from a claim.

Your data may be supplied to an industry database in order to facilitate automatic no claim discount validation checks.

### **(b) DVLA and Claims Management**

With your consent we may share your driving licence number with the DVLA to confirm the status of your driving licence, entitlement and any information relating to restrictions/endorsements/convictions. We may carry out these searches before issuing you with an insurance policy and/or at any point during the term of your policy.

In the event of a claim we may need to disclose information with any other party involved in that claim such as third parties involved in the incident, their insurer, solicitor or representative and medical teams, the police or other investigators. We also may have to investigate your claims and conviction history.

### **(c) Payment processing**

Your personal data may be processed by third parties who provide other processing services to us and we may transfer personal data to third party payment processors in order to process payments for orders (such as credit and debit card processing companies). If we use a third party order

processing services, they will collect and send your data to us securely, which will then be incorporated into our databases.

(b) **Purposes of obtaining a Quote**

We will use your personal data to obtain quotes from insurance underwriters to provide you with an insurance quote.

(c) **Our contractors**

In addition to the third parties we have already mentioned in this privacy notice, we may have your personal data processed by other third parties throughout the world who act for or on our behalf; for example, we may use cloud computing or remote database hosting services which may be located anywhere in the world and we may engage contractors anywhere in the world for the purposes of providing support or back-office services to us, including website hosting, order processing, order fulfilment, application and database hosting, data processing services, or that help us market out products and services. These companies will process and hold information about you in order to perform their functions. These companies are not authorised to use the information they process for us for any other purpose than those to which we have notified you under this privacy notice.

(d) **Legal requirements**

We may share or transfer your personal data to a government authority where required to comply with a legal requirement, for the administration of justice, or where reasonably required to protect you or your company's vital interests.

(e) **Corporate transfer**

We may transfer your personal data to any company that purchases or otherwise acquires our business in the event of a corporate sale, merger, reorganisation, dissolution or similar event.

(f) **Statistics**

We may use your personal data along with other data to provide statistics on an anonymous basis to our contractors, marketing partners (including banks and other institutions who may promote our products to their customers), and other companies and organisations we deal with, for a range of purposes, including assessing and reporting on the overall performance of our products and website, assessing and reporting on overall product take-up and usage, assessment and reporting on malware and unsafe websites and associated threats and risks in general or for any group of customers.

(g) **Credit Reference Agencies**

We carry out credit and identity checks when you apply for finance or other services from us. We may use Credit Reference Agencies (**CRAs**) to help us with this.

If you use our services, from time to time we may also search information that the CRAs have, to help us manage those accounts.

We will share your personal data with CRAs and they will give us information about you. The data we exchange may include:

- Name, address and date of birth
- Credit application
- Details of any shared credit
- Financial situation and history
- Public information, from sources such as the electoral register and Companies House.

We'll use this data to:

- Assess whether you can afford to make repayments
- Make sure what you've told us is true and correct
- Help detect and prevent financial crime
- Manage accounts with us
- Trace and recover debts
- Make sure that we tell you about relevant offers.

We will continue sharing your personal data with CRAs for as long as you are a customer. This will include details of your repayments and whether you repay in full and on time. The CRAs may give this information to other organisations that want to check credit status. We will also tell the CRAs when you settle your accounts with us.

When we ask CRAs about you, they will note it on your credit file. This is called a credit search. Other lenders may see this, and we may see credit searches from other lenders.

***If you apply for finance with someone else, we will link your records with theirs. We will do the same if you tell us you have a spouse, partner, or civil partner – or that you are in business with other partners or directors.***

***You should tell them about this before you apply for finance or another service. It is important that they know your records will be linked together, and that credit searches may be made on them.***

***CRAs will also link your records together. These links will stay on your files unless one of you asks the CRAs to break the link. You will normally need to give proof that you no longer have a financial link with each other.***

You can find out more about the CRAs on their websites, in the Credit Reference Agency Information Notice. This includes details about:

- Who they are
- Their role as fraud prevention agencies
- The data they hold and how they use it
- How they share personal data
- How long they can keep data
- Your data protection rights.

If you'd like to know about the information the credit-reference agencies hold about you, you should contact them directly – but please note, they may charge you a fee for this service (unless they are prevented from doing so by relevant laws). Not every agency will hold the same information, so you should consider contacting them all. You can contact:

- CallCredit, Consumer Services Team, PO Box 491, Leeds, LS3 1WZ, or call 0870 060 1414 (personal credit data only) or log on to [www.callcredit.co.uk](http://www.callcredit.co.uk)
- Equifax PLC, Credit File Advice Centre, PO Box 1140, Bradford, BD1 5US, or call 0844 335 0550 or log on to [www.myequifax.co.uk](http://www.myequifax.co.uk)
- Experian, Consumer Help Service, PO Box 8000, Nottingham NG80 7WF, or call 0344 481 8000 or log on to [www.experian.co.uk](http://www.experian.co.uk)

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

## 5 **International transfers**

We do not transfer your personal data outside the European Economic Area.

## 6 **Data security**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## 7 **Data retention**

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for the term of their policy and for a period of six years after they cease being customers.

In some circumstances you can ask us to delete your data: (please see below).

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

**No fee usually required**

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

### **What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

### **Time limit to respond**

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## **8 Glossary**

**Customer** means any person (including individuals, firms and companies and other organisations) who is a customer of Acorn Insurance, including person who browse, register on or, otherwise use our website, or who purchase our products.

**Legitimate Interest** means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us

**Performance of Contract** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

**Comply with a legal or regulatory obligation** means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

## **9 YOUR LEGAL RIGHTS**

You have the right to:

**Request access to your personal data** (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

**Request correction of the personal data** that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

**Request erasure of your personal data.** This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below),

where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

**Object to processing of your personal data** where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

**Request restriction of processing of your personal data.** This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

**Request the transfer of your personal data** to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

**Withdraw consent** at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.